

SUMMONS

Attorney(s) Anthony J. Brady Jr.
Office Address 1 Rose Ave
Town, State, Zip Code Maple Shade Nj
Telephone Number 5616036387
Attorney(s) for Plaintiff Nicholas Pavlak AFDA

**Superior Court of
New Jersey**

Camden County
Law Division Division

Docket No: 003046-18

Plaintiff(s)

vs.

PEGASUS REALTY GROUP, LLC et

Defendant(s)

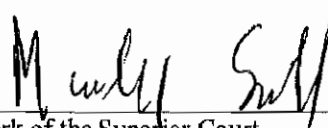
**CIVIL ACTION
SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.


Clerk of the Superior Court

DATED: 9/2/18

Name of Defendant to Be Served: PEGASUS REALTY GROUP, LLC reg agent Jonas Singer.

Address of Defendant to Be Served: 105 farnsworth Ave Bordentown New Jersey

ANTHONY J. BRADY, JR., ESQUIRE
 1 Rose Avenue
 Maple Shade, New Jersey 08052
 (561) 603-6387
 Bar Number 044541984
 Attorney for Plaintiffs

<p>NICHOLAS PAVLAK ADVOCATES FOR DISABLED AMERICANS</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>PEGASUS REALTY GROUP, LLC EFES HALAL FOOD MARKET LIMITED LIABILITY COMPANY</p> <p>JOHN DOE (s) fictitious names of Defendants A thru Z.</p> <p style="text-align: center;">Defendants.</p>	<p>SUPERIOR COURT OF NEW JERSEY CAMDEN COUNTY LAW DIVISION Civil Action Docket No.: L-</p> <p>COMPLAINT</p>
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Plaintiff Nicholas Pavlak residing at 15128 97th Drive, Jupiter, Palm Beach County, Florida. Plaintiff, Advocates for Disabled Americans and doing business in Camden County New Jersey, by way of complaint against Defendant states:

FIRST COUNT

1. Plaintiff Pavlak is disabled and uses a walker and/or wheelchair. Plaintiff is often in New Jersey having grown up in South Jersey.
2. Plaintiff Advocates for Disabled Americans (AFDA) is a civil rights organization, whose goal in part is to enforce the civil rights of the disabled with an office in Cherry Hill Camden County.
3. Defendants are the owners/operators of properties, which is shopping and/ market

located at 4000 Rt 130 North , Delran Burlington County, New Jersey .

4. Plaintiff Pavlak had been a frequent patron at Defendants shopping mall and market. including August 11, 2016. Subsequently, he has not been able to be a patron because of the lack of access.

5. His ability to utilize the services of the defendant's has been impaired as a result of the lack of access to the Plaintiff and a disabled as a whole including on many other occasions.

6. Specifically, there is improper parking and routes and bathrooms for the disabled.

7. The above violations are not exclusive. Plaintiff reserves the right to amend the Allegations as discovery progresses.

8. Plaintiff Pavlak intends to return to said public accommodation, including but not limited to the fall 2018 and 2019, when the accommodation is accessible.

Plaintiff Pavlak also intends to return as a tester.

10. As a result Plaintiff sustained distress and anger.

11. The lack of access is a violation of New Jersey Law Against Discrimination (LAD) and Americans with Disability Act (ADA).

Wherefore, Plaintiff Pavlak demands judgment for damages under the LAD.

- 1). Injunctive relief.
- 2). Attorney fees.
- 3). Costs of suit.

SECOND COUNT

12. Plaintiff AFDA repeats the allegations of the first count.

Plaintiff Advocates for Disabled Americans with offices in Cherry Hill, Camden County

New Jersey and its members have suffered and will continue to suffer direct and indirect injury as a result of this discrimination.

Wherefore, Plaintiff Advocates for Disabled Americans dements judgment for:

- 1). Injunctive relief.
- 2). Damages under the LAD
- 3). Attorney fees.
- 4). Costs of suit

THIRD COUNT

13. Plaintiffs' repeat the allegations of the first two counts.

1. 14. Defendants JOHN DOE(s) fictitious names of Defendants A thru Z, are owners/ operators and therefore are liable for the afore mentioned discrimination.

Wherefore plaintiff demands judgment for:

1. Damages under the nJLAD.
2. Injunctive relief
3. Attorney Fees.
4. Cost of suit.

Date: August 11, 2018.

s/ Anthony Brady Jr.

Anthony J. Brady Jr. Esq.

Wherefore, Plaintiff Advocates for Disabled Americans dements judgment for:

- 1). Injunctive relief.
- 2). Damages under the LAD
- 3). Attorney fees.
- 4). Costs of suit.

Date: August 12, 2018

s/ Anthony Brady

Anthony J. Brady Jr. Esq.

CERTIFICATION

I further certify pursuant to R 4.5-1, that this matter in controversy is not the subject of any court of a pending arbitration proceeding nor any other action or arbitration proceeding contemplated. Further, the Plaintiffs are not aware of any other parties that should be joined in this matter.

s/ Anthony Brady

DATED: August 12, 2018

ANTHONY J. BRADY JR. ESQUIRE

CERTIFICATION

I further certify pursuant to R 4.5-1, that this matter in controversy is not the subject of any court of a pending arbitration proceeding nor any other action or arbitration proceeding contemplated except the same cause of action was dismissed without prejudice under docket number CAM-L-000811-17.

Further, the Plaintiffs are not aware of any other parties that should be joined in this matter.

DATE: August 11, 2018.

s/ Anthony J Brady Jr.

ANTHONY J. BRADY JR. ESQUIRE